

Fill in this information to identify the case:

Debtor1 Helen Baron

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the : Eastern District of Pennsylvania
(State)

Case number 22-10294-pmm

Form 4100R Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. BANK TRUST NATIONAL ASSOCIATION,
NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER
TRUSTEE FOR RCF 2 ACQUISITION TRUST

Court claim no. (if known): 8-1

Last 4 digits of any number you use to identify the debtor's account: 4001

Property address: 6107 GLEN ROAD
Number Street
READING, PA 19606
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

☐ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim

☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$80,475.94

Part 3: Postpetition Mortgage

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:
MM/DD/YYYY

☒ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$8,106.72
- b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$550.00
- c. Total suspense: - (c) \$716.83
- d. Total. Subtract line c from the sum of lines a and b. (d) \$7,939.89

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

11 / 01 / 2024
MM/ DD/ YYYY

Debtor 1

Helen Baron

First Name

Middle Name

Last Name

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Case Number (if known)

22-10294-pmm

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and
☒ all amounts the creditor contends remain unpaid

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Shellie A. Labell
Signature

Date 04/14/2025

Print Shellie A. Labell
First Name Middle Name Last Name

Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 130 Clinton Rd., #202
Number Street

Fairfield NJ 07004
City State ZIP Code

Contact 470-321-7112

Email slabell@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 15, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Helen Baron
6107 Glen Rd.
Reading, PA 19606

And via electronic mail to:

BRENNA HOPE MENDELSON
Mendelsohn & Mendelsohn, PC
637 Walnut Street
Reading, PA 19601

SCOTT F. WATERMAN
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107

By: /s/ Dena Eaves
Dena Eaves
deaves@raslg.com

PAYMENT HISTORY

PAYMENT HISTORY PER MSP										
LOAN NUMBER			POST-PETITION							
FILING DATE			PAYMENT CHANGES							
PAYMENTS IN POC			EFFECTIVE	3/1/2022	7/1/2023	7/1/2024	1/0/1900	1/0/1900	1/0/1900	1/0/1900
FIRST POST-PETITION DUE DATE			AMOUNT	\$ 1,254.00	\$ 1,490.58	\$ 1,351.12	\$0.00	\$0.00	\$0.00	\$0.00
INCOMING FUNDS			MANUAL HISTORY					COMMENTS		
DATE	PRE-PETITION FUNDS	POST-PETITION FUNDS	PAYMENT AMOUNT	Phonepay Fee	MANUAL SUSP	MANUAL SUSP BAL	MANUAL POST PYMT	COMMENTS		
STARTING BALANCES				\$ -	\$ -	\$ -				
2/23/2022				\$ -	\$ -	\$ -				
3/3/2022				\$ -	\$ -	\$ -				
3/7/2022		\$ 1,226.54		\$ -	\$ 1,226.54	\$ 1,226.54				
3/8/2022				\$ -	\$ -	\$ 1,226.54				
3/8/2022				\$ -	\$ -	\$ 1,226.54				
3/8/2022				\$ -	\$ -	\$ 1,226.54				
3/8/2022				\$ -	\$ -	\$ 1,226.54				
3/31/2022				\$ -	\$ -	\$ 1,226.54				
4/11/2022				\$ -	\$ -	\$ 1,226.54				
4/15/2022				\$ -	\$ -	\$ 1,226.54				
4/18/2022		\$ 1,254.00	\$1,254.00	\$ -	\$ -	\$ 1,226.54	3/1/2022			
4/19/2022				\$ -	\$ -	\$ 1,226.54				
4/20/2022				\$ -	\$ -	\$ 1,226.54				
4/20/2022				\$ -	\$ -	\$ 1,226.54				
4/20/2022				\$ -	\$ -	\$ 1,226.54				
5/4/2022				\$ -	\$ -	\$ 1,226.54				
5/13/2022		\$ 1,256.00	\$1,254.00	\$ -	\$ 2.00	\$ 1,228.54	4/1/2022			
5/18/2022				\$ -	\$ -	\$ 1,228.54				
5/18/2022				\$ -	\$ -	\$ 1,228.54				
5/18/2022				\$ -	\$ -	\$ 1,228.54				
5/18/2022				\$ -	\$ -	\$ 1,228.54				
6/3/2022				\$ -	\$ -	\$ 1,228.54				
6/16/2022		\$ 1,256.00	\$1,254.00	\$ -	\$ 2.00	\$ 1,230.54	5/1/2022			
6/17/2022				\$ -	\$ -	\$ 1,230.54				
6/17/2022				\$ -	\$ -	\$ 1,230.54				
6/17/2022				\$ -	\$ -	\$ 1,230.54				
6/17/2022				\$ -	\$ -	\$ 1,230.54				
7/13/2022				\$ -	\$ -	\$ 1,230.54				
8/2/2022				\$ -	\$ -	\$ 1,230.54				
8/9/2022				\$ -	\$ -	\$ 1,230.54				
9/2/2022				\$ -	\$ -	\$ 1,230.54				
9/19/2022		\$ 1,256.00	\$1,254.00	\$ -	\$ 2.00	\$ 1,232.54	6/1/2022			
9/20/2022				\$ -	\$ -	\$ 1,232.54				
9/20/2022				\$ -	\$ -	\$ 1,232.54				
9/20/2022				\$ -	\$ -	\$ 1,232.54				
10/14/2022				\$ -	\$ -	\$ 1,232.54				
10/14/2022				\$ -	\$ -	\$ 1,232.54				
10/17/2022		\$ 1,126.50	\$1,254.00	\$ -	\$ (127.50)	\$ 1,105.04	7/1/2022			
10/17/2022				\$ -	\$ -	\$ 1,105.04				
10/17/2022				\$ -	\$ -	\$ 1,105.04				
10/19/2022				\$ -	\$ -	\$ 1,105.04				
11/10/2022				\$ -	\$ -	\$ 1,105.04				
11/28/2022		\$ 1,126.50	\$1,254.00	\$ -	\$ (127.50)	\$ 977.54	8/1/2022			
11/28/2022				\$ -	\$ -	\$ 977.54				
12/15/2022				\$ -	\$ -	\$ 977.54				
1/5/2023				\$ -	\$ -	\$ 977.54				
2/9/2023				\$ -	\$ -	\$ 977.54				
2/10/2023		\$ 1,126.50	\$1,254.00	\$ -	\$ (127.50)	\$ 850.04	9/1/2022			
2/10/2023				\$ -	\$ -	\$ 850.04				
2/10/2023				\$ -	\$ -	\$ 850.04				
3/14/2023				\$ -	\$ -	\$ 850.04				
4/5/2023				\$ -	\$ -	\$ 850.04				
4/7/2023				\$ -	\$ -	\$ 850.04				
4/18/2023		\$ 2,508.00	\$1,254.00	\$ -	\$ 1,254.00	\$ 2,104.04	10/1/2022			
4/18/2023			\$1,254.00	\$ -	\$ (1,254.00)	\$ 850.04	11/1/2022			
4/21/2023				\$ -	\$ -	\$ 850.04				
4/21/2023				\$ -	\$ -	\$ 850.04				
4/21/2023				\$ -	\$ -	\$ 850.04				
4/21/2023				\$ -	\$ -	\$ 850.04				
4/21/2023				\$ -	\$ -	\$ 850.04				
5/17/2023				\$ -	\$ -	\$ 850.04				
5/19/2023		\$ 1,254.56	\$1,254.00	\$ -	\$ 0.56	\$ 850.60	12/1/2022			
5/19/2023				\$ -	\$ -	\$ 850.60				
5/19/2023				\$ -	\$ -	\$ 850.60				
6/26/2023				\$ -	\$ -	\$ 850.60				
6/30/2023		\$ 1,254.00	\$1,254.00	\$ -	\$ -	\$ 850.60	1/1/2023			
7/10/2023				\$ -	\$ -	\$ 850.60				
7/11/2023				\$ -	\$ -	\$ 850.60				
7/12/2023				\$ -	\$ -	\$ 850.60				
7/18/2023		\$ 1,254.56	\$1,254.00	\$ -	\$ 0.56	\$ 851.16	2/1/2023			
7/31/2023				\$ -	\$ -	\$ 851.16				
7/31/2023				\$ -	\$ -	\$ 851.16				
7/31/2023				\$ -	\$ -	\$ 851.16				
8/9/2023				\$ -	\$ -	\$ 851.16				
8/21/2023				\$ -	\$ -	\$ 851.16				
8/23/2023		\$ 1,254.56	\$1,254.00	\$ -	\$ 0.56	\$ 851.72	3/1/2023			
8/23/2023				\$ -	\$ -	\$ 851.72				
8/24/2023		\$ 694.14	\$1,254.00	\$ -	\$ (559.86)	\$ 291.86	4/1/2023			
9/6/2023				\$ -	\$ -	\$ 291.86				
9/14/2023				\$ -	\$ -	\$ 291.86				
9/19/2023		\$ 1,254.56	\$1,254.00	\$ -	\$ 0.56	\$ 292.42	5/1/2023			
9/20/2023		\$ 694.14		\$ -	\$ 694.14	\$ 986.56				

9/25/2023				\$ -	\$ -	\$ 986.56		
10/11/2023				\$ -	\$ -	\$ 986.56		
10/17/2023		\$ 1,254.56	\$1,254.00	\$ -	\$ 0.56	\$ 987.12	6/1/2023	
10/17/2023				\$ -	\$ -	\$ 987.12		
11/14/2023				\$ -	\$ -	\$ 987.12		
11/17/2023		\$ 1,254.56	\$1,490.58	\$ -	\$ (236.02)	\$ 751.10	7/1/2023	
12/1/2023		\$ 0.56		\$ -	\$ 0.56	\$ 751.66		
12/6/2023				\$ -	\$ -	\$ 751.66		
12/11/2023				\$ -	\$ -	\$ 751.66		
1/12/2024				\$ -	\$ -	\$ 751.66		
1/17/2024		\$ 1,254.56	\$1,490.58	\$ -	\$ (236.02)	\$ 515.64	8/1/2023	
2/9/2024				\$ -	\$ -	\$ 515.64		
2/22/2024		\$ 1,254.56	\$1,490.58	\$ -	\$ (236.02)	\$ 279.62	9/1/2023	
3/12/2024				\$ -	\$ -	\$ 279.62		
3/19/2024		\$ 1,254.56	\$1,490.58	\$ -	\$ (236.02)	\$ 43.60	10/1/2023	
3/19/2024				\$ -	\$ -	\$ 43.60		
4/4/2024				\$ -	\$ -	\$ 43.60		
4/10/2024				\$ -	\$ -	\$ 43.60		
4/16/2024				\$ -	\$ -	\$ 43.60		
4/16/2024				\$ -	\$ -	\$ 43.60		
4/18/2024		\$ 3,979.21	\$1,490.58	\$ -	\$ 2,488.63	\$ 2,532.23	11/1/2023	
4/18/2024			\$1,490.58	\$ -	\$ (1,490.58)	\$ 1,041.65	12/1/2023	
4/18/2024				\$ -	\$ -	\$ 1,041.65		
4/18/2024				\$ -	\$ -	\$ 1,041.65		
4/18/2024				\$ -	\$ -	\$ 1,041.65		
4/26/2024		\$ 233.02		\$ -	\$ 233.02	\$ 1,274.67		
5/15/2024				\$ -	\$ -	\$ 1,274.67		
6/5/2024		\$ 1,256.50	\$1,490.58	\$ -	\$ (234.08)	\$ 1,040.59	1/1/2024	
6/12/2024				\$ -	\$ -	\$ 1,040.59		
7/9/2024				\$ -	\$ -	\$ 1,040.59		
7/17/2024		\$ 1,256.50	\$1,490.58	\$ -	\$ (234.08)	\$ 806.51	2/1/2024	
8/8/2024				\$ -	\$ -	\$ 806.51		
8/12/2024				\$ -	\$ -	\$ 806.51		
9/10/2024		\$ 3,170.40	\$1,490.58	\$ -	\$ 1,679.82	\$ 2,486.33	3/1/2024	
9/10/2024			\$1,490.58	\$ -	\$ (1,490.58)	\$ 995.75	4/1/2024	
9/11/2024				\$ -	\$ -	\$ 995.75		
9/11/2024				\$ -	\$ -	\$ 995.75		
9/16/2024				\$ -	\$ -	\$ 995.75		
10/15/2024				\$ -	\$ -	\$ 995.75		
10/21/2024		\$ 1,254.56	\$1,490.58	\$ -	\$ (236.02)	\$ 759.73	5/1/2024	
10/30/2024				\$ -	\$ -	\$ 759.73		
10/30/2024				\$ -	\$ -	\$ 759.73		
11/11/2024				\$ -	\$ -	\$ 759.73		
12/2/2024		\$ 2,513.00	\$1,490.58	\$ -	\$ 1,022.42	\$ 1,782.15	6/1/2024	
12/5/2024				\$ -	\$ -	\$ 1,782.15		
12/6/2024				\$ -	\$ -	\$ 1,782.15		
12/6/2024				\$ -	\$ -	\$ 1,782.15		
1/13/2025				\$ -	\$ -	\$ 1,782.15		
1/16/2025		\$ 1,256.50	\$1,351.12	\$ -	\$ (94.62)	\$ 1,687.53	7/1/2024	
2/12/2025			\$1,351.12	\$ -	\$ (1,351.12)	\$ 336.41	8/1/2024	
2/20/2025		\$ 3,082.66	\$1,351.12	\$ -	\$ 1,731.54	\$ 2,067.95	9/1/2024	
2/21/2025			\$1,351.12	\$ -	\$ (1,351.12)	\$ 716.83	10/1/2024	
3/11/2025				\$ -	\$ -	\$ 716.83		
4/4/2025				\$ -	\$ -	\$ 716.83		
48/2025				\$ -	\$ -	\$ 716.83		
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